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6 Attorneys for Defendants
7 THE GAP, INC. and BANANA REPUBLIC, LLC

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 CHARMEANA MCFARLAND,
11 individually,

12 Plaintiff,

13 vs.

14 THE GAP, INC. dba BANANA
15 REPUBLIC, a foreign corporation;
BANANA REPUBLIC, LLC, a domestic
limited-liability corporation;

16 Defendants.

Case No. 2:18-cv-00534-RFB-GWF

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES AND
SCHEDULING ORDER**

(FIRST REQUEST)

17 Pursuant to Local Rules IA 6-1 and 26-4, THE GAP, INC. d/b/a BANANA REPUBLIC
18 AND BANANA REPUBLIC, LLC (“Defendants”), by and through their attorneys of record, and
19 Plaintiff, CHARMEANA MCFARLAND (“Plaintiff”), by and through her attorney of record,
20 hereby stipulate to extend the outstanding discovery deadlines in the Discovery Plan and Scheduling
21 Order (**ECF No. 11**) for a period of ninety (90) days. This is the first request for an extension to the
22 discovery plan and scheduling order in this matter. The requested extension is sought in good faith
23 and not for purposes of undue delay. Further, this request is supported by good cause.

24 **DISCOVERY COMPLETED TO DATE**

25 The parties have exchanged initial disclosures pursuant to FRCP 26(a)(1). The parties have
26 propounded their First Set of Interrogatories and Requests for Production of Documents and Plaintiff
27 has submitted responses.
28

1 **DISCOVERY THAT REMAINS TO BE COMPLETED**

2 Written discovery is ongoing in this case including Defendants' responses to Plaintiff's
3 written discovery. The parties anticipate depositions will be taken after written discovery has been
4 completed.

5 **REASONS FOR EXTENSION TO COMPLETE DISCOVERY**

6 This extension is necessary to allow the parties to conserve their resources for settlement
7 discussions given that the Early Neutral Evaluation Conference was rescheduled from June 14, 2018
8 to September 5, 2018. The parties are engaging in settlement discussions and attempting to resolve
9 the case prior to the Early Neutral Evaluation Conference, but wish to devote their resources to
10 possible resolution of this matter through settlement. The parties believe that, absent any unforeseen
11 circumstances, all necessary discovery can be accomplished by the requested extended deadlines.

12 **PROPOSED REVISED DISCOVERY PLAN**

13 1. Discovery Cut-Off Deadline

14 The discovery cut-off deadline shall be extended from October 15, 2018 to January 14, 2019.¹

15 2. Amending the Pleadings and Adding Parties

16 The date for filing motions to amend the pleadings or to add parties shall be extended from July 17,
17 2018 to October 15, 2018.

18 3. Expert and Rebuttal Disclosures

19 The expert disclosure deadline shall be extended from August 16, 2018 to November 14, 2018 and
20 the rebuttal expert disclosure deadline shall be extended from September 17, 2018 to December 17,
21 2018.²

22 4. Dispositive Motions Deadline

23 The dispositive motions deadline shall be extended from November 14, 2018 to February 12, 2019.

24 5. Joint Pretrial Order Deadline

25 The Joint Pretrial Order deadline shall be extended from December 14, 2018 to March 14, 2019. In
26

27 ¹ With respect to the discovery cut-off deadline, the deadline falls on Sunday, January 13, 2019. As a result, the
discovery cut-off deadline extends to the next Court day of Monday, January 14, 2019 by operation of FRCP 6.

28 ² With respect to the rebuttal expert disclosure deadline, the deadline falls on Sunday, December 16, 2018. As a result, the
rebuttal expert disclosure deadline extends to the next Court day of Monday, December 17, 2019 by operation of FRCP 6.

the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until 30 days after the Court enters a ruling on the dispositive motions or otherwise by further order of the Court.

6. Interim Status Report Deadline

The Interim Status Report deadline shall be extended from August 16, 2018 to November 14, 2018.

7. Extensions or Modification of the Discovery Plan and Scheduling Order:

In accordance with Local Rule 26-4, any stipulation or motion for modification or extension must be made at least 21 days prior to the expiration of the subject deadline.

Accordingly, the parties stipulate to the following revised schedule:

Deadline	Current Deadline	Revised Deadline
Amend Pleadings/Add Parties	July 17, 2018	October 15, 2018
Interim Status Report	August 16, 2018	November 14, 2018
Expert Disclosures	August 16, 2018	November 14, 2018
Rebuttal Expert Disclosures	September 17, 2018	December 17, 2018
Discovery Cut-Off	October 15, 2018	January 14, 2019
Dispositive Motions	November 14, 2018	February 12, 2019
Joint Pretrial Order	December 14, 2018	March 14, 2019

Dated: June 19, 2018

Respectfully submitted,

/s/ Andre M. Lagomarsino, Esq.

ANDRE M. LAGOMARSINO, ESQ.
LAGOMARSINO LAW

Attorney for Plaintiff
CHARMEANA MCFARLAND

Dated: June 19, 2018

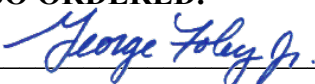
Respectfully submitted,

/s/ Kaitlyn M. Burke, Esq.

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KAITLYN M. BURKE, ESQ.
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Attorneys for Defendants
THE GAP, INC. and BANANA REPUBLIC, LLC

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 6-20-2018